

# Exhibit Q

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF ALAMEDA

3 HON. RICHARD SEABOLT, JUDGE

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5 ANTHONY HERNANDEZ VALADEZ ,

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Plaintiff ,

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vs .

Case No. 22CV012759

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JOHNSON & JOHNSON , et al . ,

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Defendants .

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15 Reporter's Transcript of Remote Proceedings

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Wednesday , March 15 , 2023

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Reported By: Sheila Pham , CSR No. 13293

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1 jury can't hear from.

2 Dr. Longo testified that he photographs -- he  
3 photographs and produces the photographs of all of the  
4 slides. I don't know if these slides still exist.

5 And by the way, at no point in time -- they do  
6 degrade quickly over time. I don't know how quickly off  
7 the top of my head. But at no point in time in the six  
8 years of litigation has J&J ever sought this relief in  
9 any other case, and they've had more than, you know,  
10 cross-examination of Dr. Longo.

11 So this is a new request for the first time in  
12 this case that I've never heard of before, and I don't  
13 know the specifics. I just got a response about an hour  
14 before our hearing started, a detailed response. And so  
15 I haven't had a chance to talk to Dr. Longo and to have  
16 further meet and confer on this issue.

17 With regards to the samples, this is a sample  
18 -- they claimed to take the product off the market, the  
19 talc product, during COVID, May of 2020. Well, in the  
20 fall of 2022, we found near Mr. Valadez's house at the  
21 hotel where his deposition was, actually, this filled  
22 Johnson & Johnson product. Not only was it filled, it  
23 was wrapped in plastic in a box, Johnson & Johnson. So  
24 two and a half years after they claimed to quit making  
25 this product, it's on the marketplace.

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1 REPORTER'S CERTIFICATION  
23 I, Sheila Pham, a Certified Shorthand Reporter, do  
4 hereby certify:5 That the foregoing proceedings were taken before me  
6 at the time and place therein set forth, that the  
7 proceedings were reported stenographically by me and  
8 were thereafter transcribed under my direction and  
9 supervision, and that the foregoing pages contain a  
10 full, true and accurate record of all proceedings and  
11 testimony to the best of my skill and ability.12 In witness whereof, I have subscribed my name.  
1314  
15 Dated: 3/20/2023  
16  
1718   
1920 Sheila Pham  
2122 CSR No. 13293  
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